



August 6, 2019

Ministry of Municipal Affairs and Housing  
17th Floor  
777 Bay Street  
Toronto, ON M5G 2E5  
Attn: Hon. Steve Clark

Dear Sir:

**Re: Environmental Registry of Ontario - Comments on Bill 108**

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The Corporation of the Town of Penetanguishene has reviewed Bill 108 – More Homes More Choices Act, 2019 and the proposed changes to the *Planning Act*, the *Development Charges Act* and the proposed new regulations regarding the Community Benefits Authority which were posted on the Environmental Registry of Ontario as #019-0181, #019-0183 and #019-184, on June 21, 2019.

On July 31, 2019 a report by staff was presented to Council and the following comments were endorsed by Council for submission to the ERO posting:

- Continued concerns with the limitations being set on “who” can submit appeals to municipal land use planning decisions;
- Concerns regarding municipal land use planning decisions that have been recently made, for example, the Town’s new Official Plan which was approved by the County of Simcoe on June 24, 2019 and how the transitional matters may impact the appeal that has been submitted;
- Are of the opinion that the details with respect to Accessory Dwelling Units, specifically with respect to parking, are best left to local municipalities to regulation through Zoning By-laws;
- Significant concerns with meeting the proposed date of the Community Benefits Authority. Municipalities’ have had little to no time to understand the financial impacts, consider the process by which a Community Benefits Charge is to be prepared and rearrange long term capital budgets that meet the January 2, 2021 date;
- Request that a formula by which a Community Benefits Charge is to be calculated be established as soon as possible and that the Province obtain public feedback on the formula;
- Suggest that the rate of the Community Benefits Charge be greater than the 5% parkland dedication fee currently set in the *Planning Act* if the intent of the regulation is to ensure that municipal revenues historically collected from development charges are maintained. Further that the Province consults on the



rate of the Community Benefits Charge and allow municipalities sufficient time to analyze the impacts;

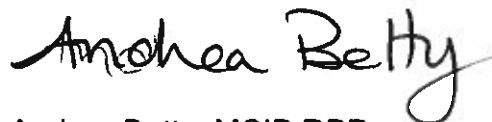
- Identify when the value of land subject to a development be set and under what method (e.g. by appraisal, assessment value, etc.) and note that the proposed dispute mechanism in regards to the preparation of appraisals should have some flexibility in terms of the time frames; and lastly
- Suggest that the Province consider the requirement to register on title an instrument which identifies deferred development charges.

We trust the above is satisfactory, should you have any questions please contact Andrea Betty, Director of Planning and Community Development at 705-549-7453 ext. 215 or by email at [abetty@penetanguishene.ca](mailto:abetty@penetanguishene.ca)

Thank you.

Yours truly,

**THE CORPORATION OF THE TOWN OF PENETANGUIHENE**

A handwritten signature in black ink that reads "Andrea Betty". The signature is written in a cursive, flowing style.

Andrea Betty, MCIP RPP  
Director of Planning and Community Development